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[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note:	Statement must be completed by an in	ndividual with managerial and/or sup	pervisory capacity.
James Bruce	Billis (Attorney	for Applicant 11/30/07
Print or Type Name	Signature	Title	Date
	l	<u>jamesbruc</u> e-mail Address	ceaol.com

JAMES BRUCE ATTORNEY AT LAW

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POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213 SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone) (505) 660-6612 (Cell) (5050 982-2151 (Fax)

jamesbruc@aol.com

November 30, 2007

Hand Delivered

Mark E. Fesmire, P.E. Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Fesmire:

Pursuant to Division Rule 104.F(2), Apache Corporation applies for administrative approval of an unorthodox oil well location for the following well:

Well Name:	D.C. Hardy Well No. 11
Well Location:	Surface: 990 feet FSL & 1540 feet FEL
	Bottom Hole: 990 feet FSL & 1330 feet FEL
Well Unit:	SW ¹ / ₄ SE ¹ / ₄ of Section 20, Township 21 South, Range 37 East,
	N.M.P.M., Lea County, New Mexico

The well will test the Blinebry (Blinebry Oil and Gas Pool), Tubb (Tubb Oil and Gas Pool), and Drinkard (Drinkard Pool) formations, and applicant requests unorthodox location approval in all three zones. The Blinebry, Tubb, and Drinkard zones are expected to be oil productive.

The application is based on geological and engineering reasons. A complete discussion, with exhibits, is attached as Exhibit A. The well is in the approximate center of existing Blinebry, Tubb, and Drinkard wells, and the proposed location will drain additional undrained reserves.

Exhibit B is a land plat. The D.C. Hardy fee lease covers the $S\frac{1}{2}SE^{1}$ of Section 20, and it has common ownership in the subject formations. The location is internal to the lease, and no offset owner is adversely affected by the application. Therefore, notice has not been provided to anyone.

Please call me if you need any further information on this matter.

Very truly yours,

۰

,

James Bruce

Attorney for Apache Corporation

Application of Apache Corporation for administrative approval of an unorthodox well location:

40 acres - SL: 990' FSL & 1540' FEL BHL: 990' FSL & 1330' FEL Section 20, Township 21 South, Range 37 East, NMPM Lea County, New Mexico

PRIMARY OBJECTIVES:

Blinebry, Tubb, and Drinkard

In support:

- 1. Apache Corporation (Apache) is the operator of the proposed **DC Hardy #11** well (**Exhibit 1**).
- 2. The proposed unorthodox location encroaches only toward wells, which are, or have been, productive from various combinations of the Blinebry, Tubb, and Drinkard in Drilling and Spacing Units O and P (Exhibit 2). Wells in Units I and J, away from which DC Hardy #11 is a standard distance, are included from for completeness. Exhibit 2 displays wells with a total depth equal to, or greater than, 5500', sufficient to penetrate at least part of the Blinebry, Tubb, and Drinkard interval. Production from the three reservoirs is assigned to individual Blinebry Oil and Gas, Tubb Oil and Gas, and Drinkard Pools, but downhole commingling is pre-approved pending submission of allocations to the Hobbs District Office. The cumulative and daily production values displayed on Exhibit 2 are only for the Blinebry, Tubb, and Drinkard reservoirs.

API					Cum	Daily
30025	Op.	Well	Loc	Pool	O/G/W	O/G/W
06694	Apache Corp	DC Hardy Gas U #05	P-20	Paddock (49210)	0/34/0	0/39/0
06694	Apache Corp	DC Hardy Gas U #05	P-20	Blinebry Gas (72480)	71/5906/13	0/0/0
06690	Apache Corp	DC Hardy #03	P-20	Penrose Skelly	10/143/240	2/24/96
				Grayburg (50350)		
06690	Apache Corp	DC Hardy #03	P-20	Drinkard (19190)	198/1469/24	0/0/0
06691	Apache Corp	DC Hardy #04	O-20	Tubb Oil (60240)	14/3/21	5/0/5
06691	Apache Corp	DC Hardy #04	O-20	Drinkard (19190)	362/2067/108	4/49/0
38004	Apache Corp	DC Hardy #09	O-20	Drinkard (19190)	9/21/6	57/138/33
06689	Marathon Oil	Dayton Hardy #3	J-20	Penrose Skelly	20/311/6	0/0/0
				Grayburg (50350)		
06689	Marathon Oil	Dayton Hardy #3	J-20	Paddock (49210)	2/22/119	3/52/212
06689	Marathon Oil	Dayton Hardy #3	J-20	Blinebry Oil (06660)	14/213/8	0/0/0
06689	Marathon Oil	Dayton Hardy #3	J-20	Drinkard (19190)	132/410/6	0/0/0
06688	Marathon Oil	Dayton Hardy #2	I-20	Blinebry Oil (06660)	13/200/10	1/9/1
06688	Marathon Oil	Dayton Hardy #2	I-20	Tubb Oil (60240)	4/57/9	1/2/0
06688	Marathon Oil	Dayton Hardy #2	I-20	Drinkard (19190)	126/437/3	1/24/0



MBO

BOPD

MMCFG	MCFGPD
MBW	BWPD

3. Apache expects the proposed **DC Hardy #11** to test as an oil well in each of the three reservoirs. DC Hardy Gas Unit #5 produced as a gas well from the Blinebry. **Exhibit 3**, structure on top of the Tubb, shows that the proposed **DC Hardy #11** location should be low to DC Hardy Gas Unit #5 and more likely to be oil productive. **Exhibit 4**, the electric log over the Blinebry interval of DC Hardy Gas Unit #5, shows that it was perforated only in the upper Blinebry where gas would be preferentially segregated by gravity. DC Hardy Gas Unit #5 is no longer producing from the Blinebry, so even if **DC Hardy #11** tests as a gas well in the Blinebry, no dedication problem should occur. Should any other reservoir test gas, Apache will either gain the appropriate approvals from the OCD to produce or abandon the reservoir.

4. The proposed **DC Hardy #11** location of 990' from south line and 1540' from east line is based upon drainage considerations. The desired location was 990' from south line and 1310' from east line to drain reserves the current wells in Drilling and Spacing Units O and P could not, but surface obstructions necessitated moving the location and the shortest move was to this proposed location.

a. Geology

The Blinebry, Tubb, and Drinkard Formations are members of the Yeso Group, Permian Leonardian in age. All three formations are shallow marine carbonates, consisting primarily of dolomite. The Tubb has appreciable clastic content and the Drinkard can become limey toward its base. Anhydrite can occur throughout the interval. Pay zones are thin, erratically distributed, and separated by thick impermeable intervals. Porosity and permeability are low. Wells are not generally capable of draining a full 40 Acre spacing unit. In fact, Apache's calculations indicate drainage area is often less than 20 Acres.

Apache routinely fracture stimulates perforations in each of the three formations then produces them commingled and allocates production based upon well tests. At this stage in the history of all three pools, economics do not generally permit development of individual reservoirs. Thus, pay from all three reservoirs must be considered for well proposals. A combined Blinebry, Tubb, Drinkard map extracted from a larger area map is, therefore, presented (**Exhibit 5**).

The reservoir was analyzed by mapping hydrocarbon pore volume (SoPhiH) (**Exhibit 5**) of the entire Blinebry, Tubb, and Drinkard interval. SoPhiH is the product of feet of net pay (H) times average porosity (PhiA) times oil saturation (So). The values were obtained as follows:

 Net Pay was read from modern neutron-density logs which have contractor calculated cross-plotted porosity (XPhi) using a minimum of 5% and a maximum of 20%. Additionally, gamma ray (40 APIU in the Blinebry and Drinkard and 50 APIU in the Tubb) and water saturation (10% - 50%, using a standard equation with a=1 and m=n=2) cutoffs were also employed.

- 2. Average Porosity was calculated for intervals meeting those criteria.
- 3. Oil Saturation is the additive inverse of water saturation.

This analysis requires modern neutron-density and resistivity logs. Although water saturations can be adequately estimated from offsetting modern wells, many wells had to be excluded from analysis because of the vintage or type of porosity logs. SoPhiH isopach lines were modeled after cumulative production isopach lines where new well control is lacking. This procedure has proved successful for Apache in recent drilling in the area.

b. Drainage

The following table provides drainage areas calculated from the SoPhiH map and reserves of the offsetting wells. SoPhiH values are either from modern logs, or estimated from the grid. Wells with values determined from modern logs will be in bold.

[SoPhiH	Area	EUR	EUR
Op.	Well	Loc	Reservoir	FT	Α	MBO	MMCFG
Apache	DC Hardy Gas U #05	P-20	BTD	10.59	10	71	5906
Apache	DC Hardy #03	P-20	BTD	10.63	27	198	1469
Apache	DC Hardy #04	O-20	BTD	10.87	53	400	2200
Apache	DC Hardy #09	O-20	BTD	10.54	19	139	242
Marathon	Dayton Hardy #3	J-20	BTD	9.56	22	146	623
Marathon	Dayton Hardy #2	I-20	BTD	9.35	22	143	694

The proposed **DC Hardy #11** was planned as a "true" 20 Acre infill location between existing Blinebry, Tubb, and Drinkard producers. The location was placed in the center of the vacant area between the existing wells, and then moved due to surface conditions and cultural obstructions.

Reserves for the proposed location were calculated by planimetering the undrained area of the SoPhiH isopach which lies under a drainage circle (the size of which is the average of the direct offset drainage areas) centered on the proposed location. Any competitive drainage is shared between the proposed well and the existing offset wells. The results are as follows:

				SoPhiH	Area	EUR	EUR
Op.	Well	Loc	Reservoir	Ft	Α	MBO	MMCFG
Apache	DC Hardy #11	O-20	BTD	10.78	9	69.4	200

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Blinebry Perforations **EXHIBIT 3** DC Hardy #11





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